

# Frankfurt Kurnit Klein + Selz PC

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July 6, 2018

**VIA ECF**

The Hon. Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, New York 10007

RE: Laspatha DeCaro Studio Corp. v. Rimowa GmbH, et al., No. 16-cv-0934

Dear Judge Schofield:

We represent plaintiff Laspatha DeCaro Studio Corporation (“LD”) in the above-captioned matter, and write together with counsel for defendants Rimowa GmbH, Rimowa Distribution Inc., and Rimowa Inc. (collectively, “Rimowa”), and Meiré GmbH & Co. KG d/b/a Meiré and Meiré (“Meiré”). LD, Rimowa and Meire are pleased to report that they have reached a settlement in principle which, once reduced to an executed agreement, will resolve all of LD’s claims against the remaining defendants without further litigation. *See* Stipulation and Order dated January 18, 2018, Dkt. No. 212 (withdrawing LD’s claims against Defendant Shotview Berlin Photographers Management GmbH).

Accordingly, the parties respectfully request that the Court adjourn each of the pretrial deadlines set in the scheduling order dated June 22, 2018, Dkt. No. 240 (the “Pretrial Scheduling Order”), for a period of not less than 30 days. This brief adjournment will enable the parties to focus on negotiating a final settlement agreement that reflects the terms of the existing settlement in principle, and would avoid the need to burden the Court with *in limine* motions, jury forms, and other pretrial filings that will likely be unnecessary under the circumstances.

This is the parties’ first request for an adjournment of the Pretrial Scheduling Order, and each of LD, Rimowa, and Meire have consented to the relief requested. Enclosed with this letter is a proposed order that would amend the Pretrial Scheduling Order to reflect the parties’ requested deadlines.

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Counsel for LD, Rimowa, and Meiré are available on or after Monday July 9 at the Court's convenience to discuss any of the matters discussed above.

Respectfully Submitted,  
**Frankfurt Kurnit Klein & Selz P.C.**

*/s/ Andrew J. Ungberg*

Andrew J. Ungberg  
Maura J. Wogan  
Lily Roos

*Attorneys for Plaintiff LaSpata DeCaro  
Studio Corporation*

Cc: All attorneys of record (via ECF)